

March 8, 2022

To Clatsop County Planning Commission
Gail Hendrikson, Clatsop County Development

From Viviane Simon-Brown, Friends of Falcon Cove Beach
79028 Cove Beach Rd and
1314 NW Taylor, Corvallis OR

RE Short-term rental Comments

*Wisdom consists of the anticipation of consequences ~Norman Cousins
Time is a non-renewable resource.*

In a recent meeting, several County Commissioners voiced their frustration in spending inordinate amounts of time on short term rental problems for a tiny part of the entire County. Residents of Falcon Cove Beach feel the same way. In addressing STR issues, rather than dealing with small details, we must look at the Big Picture. Here are three big picture issues that have been lost in our discussions.

First, Falcon Cove Beach is still primarily and geographically, a natural landscape, surrounded on three sides by protected lands, and on the fourth by Cape Falcon Marine Reserve. Our residential community is truly the bridge between the forest and the sea. Economic short-term gain must not be the driving force here. Environmental integrity is crucial and critical. Let's not sacrifice it.

Second big picture point. Since January 1992, the new Coastal Residential (CR) Zoning Ordinance doesn't permit or give conditional use to short term rentals or vacation rentals or any other kind of commercial activity. It's against the law - period. County staff and Planning Commission citizens, working together, determined CR Zone was/is "intended to encourage residential and very limited recreation development." (LAWDUC) It's on the books.

Coastal Residential (CR) Zone is a tiny percentage of Clatsop County acreage. It covers our Cove plus Arcadia Beach (less than 20 homes) plus Silver Point (no residents as far as I know.) What these three CR Zone areas have in common: bluffs or cliffs making beach access difficult, dangerous rip currents, and little or no public parking.

Two experienced land-use attorneys have stated STRs are commercial businesses which the CR Zone precludes. Clatsop County counsel even stated in a recent meeting, "let's call it as it is - STRs are commercial businesses." We should be assessing equitable ways to slowly reduce the number of STRs which have been accidentally and illegally permitted by the County in the CR Zone. Our Friends group has offered a long-term, gradual phase out removing newer STRs first. This has been totally ignored, and now the County plans to simply change the CR Zone ruling to allow STRs in all rural zones. You are breaking the law.

Third big picture: Affordable housing. In the Clatsop County Housing Strategies Report, January 2019, *Control Commercial Use of Residential Land: Non-residential uses of housing units should be discouraged and/or controlled to the extent possible. This includes housing used purely for short-term rental and investment income. It can be helpful to shift the mindset to thinking of these as commercial uses (like a hotel) taking place in residential zones where they may not be appropriate.*

Our Friends group proposes that Clatsop County staff work with a balanced mix of STR owners and Cove Beach residents to develop phased down exit strategies for STRs in Coastal Residential Zone. Let's not spend any more time on details until we address these Big Picture issues.

Thank you for your time.